

Dr. D. Clark Gibbs, Regulatory Official  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550, A4-70  
Richland, Washington 99352

Direct tel: (509) 376-9936  
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CCN: 012657

Date:

Dear Dr. Gibbs:

**CONTRACT NO. DE-AC06-96RL13308 – W375 – BNFL INC. SUBMITTAL OF  
AUTHORIZATION BASIS AMENDMENT REQUEST, ABAR-W375-00-00006  
REVISION 1, AUTHORIZATION BASIS MAINTENANCE – PROCEED-AT-RISK**

- References: 1) CCN 012784, Letter, D. C. Gibbs, DOE/RL, to M. J. Bullock, BNFL Inc.,  
“RL/REG-97-13, Contractor-Initiated Changes to the Authorization Basis,  
Rev. 6,” 00-RU-0285, dated April 12, 2000.
- 2) CCN 011702, Letter, A. J. Dobson, BNFL Inc., to D. C. Gibbs, DOE/RL, “BNFL  
Inc. Submittal of Authorization Basis Amendment Request, ABAR-W375-00-  
00006; Authorization Basis Maintenance Proposal; and Proposed Revision to  
Regulatory Unit Position on Contractor-Initiated Changes to the Authorization  
Basis, RL/REG-97-13,” dated March 1, 2000.

A disk in Microsoft Word format containing this letter and the attachments is included for the  
Regulatory Unit’s use (Attachment 3).

Attached for your review and approval is Revision 1 to ABAR-W375-00-00006, which  
supersedes Revision 0 of the ABAR, which was transmitted in Reference 1. The revision  
incorporates changes recommended by Regulatory Unit (RU) staff following discussions on  
BNFL Inc.’s (BNFL) proposal to “Deviate from the Authorization Basis.” The revision also  
incorporates the RU’s proposed changes to RL/REG-97-13 transmitted in Reference 2, with the  
following clarifications:

1. The definition of “Start of Cold Testing” is reworded to clarify that this milestone  
does not occur at the beginning of the commissioning and startup program and to  
account for the fact that commissioning and startup of each process facility will be  
phased, not simultaneous. These changes have been discussed with your staff.

2. BNFL will conform to the documentation and reporting requirements of AB deviations proposed in RL/REG-97-13, Rev. 6; however, our revision to section 3.3.3 of the ISMP takes credit for the existing Corrective Action Management System database to implement these requirements.

As a reminder, approval and incorporation of this ABAR is integral with BNFL's commitment to align the facility design with the Authorization Basis by April 24, 2000. We appreciate your prompt attention to this amendment request.

If you have any questions or comments, please call Dennis Klein at 371-4867.

Yours sincerely,

A.J. Dobson  
Manager, Operations and Safety

TRM/gls

Attachments: 1) Authorization Basis Amendment Request, ABAR-W375-00-00006, Rev. 1  
2) Safety Evaluation, SE-W375-00-00005, Rev. 1  
3) Disk with Letter and Attachments

cc: <u>Name (ALPHABETIZE)</u>	<u>Organization</u>	<u>MSIN</u>
Barr, R. w/a	DOE/RL	A4-70
Barrett, M.K. w/o	DOE/ORP	H6-60
Brown, N. w/a	DOE/ORP	H6-60
Bullock, M.J. w/a	BNFL Inc.	A114
Dobson, A.J. w/a	BNFL Inc.	A117
Edwards, D.W. w/a	BNFL Inc.	P129
Hartnett, R. w/a	BNFL Inc.	A115
Klein, D. A., w/a	BNFL Inc.	P125
Landry, W. w/o	BNFL Inc.	Fairfax
McDonnell, T. R. w/a	BNFL Inc.	R105
Molnar, E. w/o	BNFL Inc.	A216
Morgan, S.R. w/o	BNFL Inc.	A116
PDC w/a	BNFL Inc.	K110
Platt, M. w/a	BNFL Inc.	R109
Smith, L. w/o	BNFL Inc.	B220
Smyser, L. w/a	PNNL	H6-61
Tooze, R. w/o	BNFL Inc.	Fairfax

cc: <u>Name (ALPHABETIZE)</u>	<u>Organization</u>	MSIN
Williams, N. w/a	BNFL Inc.	A215